



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

boundaries, or to location or identity, we find this sharp conflict in the cases. *Hicks v. Deemer*, 187 Ill. 164, 58 N. E. 252; *Mountain v. Day*, 91 Minn. 249, 97 N. W. 883.

GOVERNOR'S VETO—DIVISION OF ITEM IN APPROPRIATION BILL.—The legislature of Wyoming included in an appropriation bill an item of \$15,000 for the expenses of the State Geologist. The governor approved the item to the extent of \$10,000 and disapproved \$5,000 thereof. The State Constitution gave him the right to veto "item or items, or part or parts" of an appropriation bill. *Held*, this constitutional provision gives him the right to veto a part of an item. *State ex rel. Jamison v. Forsyth* (Wyo.), 133 Pac. 521.

The veto power is not inherent in the Governor, but is conferred upon him by the state constitution, and it must be strictly construed by that instrument. *State ex rel. Teachers of Industrial Institute v. Holder*, 76 Miss. 158, 23 So. 643; *Fulmore v. Lane* (Tex.), 140 S. W. 405; *May v. Topping*, 65 W. Va. 656, 64 S. E. 848. And where the language is plain and the intent clearly deducible, extrinsic circumstances and practical construction are not permitted to have force in its interpretation. STORY ON CONST. 5 ed., 407; COOLEY'S CONST. LIM. 6 ed., 84. Applying, this acknowledged rule of construction to the provision in question, it seems evident that the Governor was given the right to veto only *in toto* any distinct item of the bill. The result obtained was due to the failure of the court to observe the distinction between "item" and "part of an item," or in construing a "part of a bill" to mean a "part of an item," which loose construction is hardly justifiable.

NUISANCES PER SE—PROOF OF NEGLIGENCE.—In an action by plaintiff to recover damages for injuries sustained as a result of the explosion of the defendant's nitroglycerin factory. *Held*, proof of the defendant's negligence is not essential to the plaintiff's recovery. *French v. Center Creek Powder Mfg. Co.* (Mo.), 158 S. W. 723. See NOTES, p. 146.

PARENT AND CHILD—EMANCIPATION—RIGHTS OF PARENT'S CREDITORS.—A father employed his infant son at a salary of \$100 a month, and the son paid his mother \$6 a week for board and lodging. The son had never been expressly emancipated, and the only evidence introduced in support of the implied emancipation was the testimony of the father and son. *Held*, the implied emancipation, under an oral agreement, is not sufficient to justify allowing the son to recover from his bankrupt father's estate, the balance due him on his salary for the three months prior to the adjudication. *Re Riff*, 205 Fed. 406.

The earnings of an unemancipated child may be reached by the parent's creditors and subjected to the parent's debts. *Donegan v. Davis*, 66 Ala. 362. But an infant's earnings cannot be reached by creditors of the parent where the parent has clearly relinquished his right to those earnings. *Penn v. Whitehead*, 17 Gratt. (Va.) 503, 94 Am. Dec. 478; *Whiting v. Earle*, 3 Pick. (Mass.) 201, 15 Am. Dec. 207. A bona fide employment of an infant by his father at stipulated wages is valid and